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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**THE MULTI-STATE GOVERNMENTAL ENTITIES GROUP'S
STATEMENT IN SUPPORT OF THE MOTION TO INTERVENE BY THE
NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE**

TO THE HONORABLE ROBERT D. DRAIN, UNITED STATES BANKRUPTCY JUDGE:

The Multi-State Governmental Entities Group (“**MSGE Group**”) hereby files this statement in support of the motion to intervene by the National Association for the Advancement of Colored People (“**NAACP**”) [ECF No. 1555], stating as follows:

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

1. The MSGE Group represents a diverse group of approximately 1,300 entities, including cities, counties, other governmental entities, tribal nations, hospital districts, independent school districts, medical groups, and funds across 37 states and territories.

2. The diversity of the constituents of the MSGE Group reflects the Nation itself. The MSGE Group welcomes the addition of the NAACP's voice to the mediation process. Indeed, the NAACP's long and powerful history of advocacy for Americans who may otherwise be underserved in important areas at issue in this bankruptcy will help to ensure that the perspectives and needs of the people served by the MSGE Group are adequately considered in this bankruptcy.²

For the foregoing reasons, the MSGE Group respectfully requests that the NAACP's motion to intervene be granted.

² Courts in this district and elsewhere have granted the NAACP's motions to intervene in cases of public significance. *E.g.*, *United States v. Yonkers Bd. of Educ.*, 518 F. Supp. 191, 203 (S.D.N.Y. 1981) (granting permissive intervention and noting the importance of taking into consideration "the position of the NAACP and of the minority residents of Yonkers for whom they purport to speak"); *Johnson v. Mortham*, 915 F. Supp. 1529, 1538-39 (N.D. Fla. 1995) (recognizing value of the NAACP's perspective and granting permissive intervention because NAACP's participation would aid the court); *Mississippi State Democratic Party v. Barbour*, Civil Action No. 4:06CV29-P-B, 2007 WL 2071800, at *7 (N.D. Miss. July 17, 2007) (granting permissive intervention by NAACP as a "non-aligned party to intervene in the remedial stages of a lawsuit"); *Donald J. Trump for President, Inc. v. Boockvar*, Case 2:20-cv-00966-NR (W.D. Penn. Aug. 3, 2020), ECF No. 309 (granting permissive intervention by NAACP Pennsylvania State Conference). It has been "the traditional attitude of the federal courts to allow intervention 'where no one would be hurt and greater justice would be attained.'" *McDonald v. E. J. Lavino Co.*, 430 F.2d 1065, 1074 (5th Cir. 1970) (citation omitted).

Dated: August 18, 2020

Respectfully submitted,

/s/ Kevin C. Maclay

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CERTIFICATE OF SERVICE

I, Cecilia Guerrero, certify that, on August 18, 2020, I caused a true and correct copy of the foregoing document to be served (i) by the Court's Case Management/Electronic Case File (CM/ECF) System to all parties who are deemed to have consented to electronic service; and (ii) by email upon the parties set forth in the Master Service List maintained by the Debtors.

/s/ Cecilia Guerrero

Cecilia Guerrero